

# Exhibit 2

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

MICHAEL DUPREE, JR., Case No.  
a Colorado Resident,  
MICHAEL DUPREE, SR., 2:10-CV-12094-LPZ-MKM  
and DARLENE DUPREE, his parents,  
Residents of the Country of Austria,  
Plaintiffs,  
vs.  
CRANBROOK EDUCATIONAL COMMUNITY,  
JOHN J. WINTER, and CHARLES SHAW,  
Defendants.

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The Deposition of MICHAEL DUPREE,  
SR., a Plaintiff in the above-entitled cause,  
taken by Shari J. Pavlovich, CSR-5926, Certified  
Shorthand Reporter, Registered Professional  
Reporter, Certified Realtime Reporter, and Notary  
Public for the County of Wayne, acting in the  
County of Macomb, State of Michigan, at 24825  
Little Mack, St. Clair Shores, Michigan, on  
Tuesday, December 14, 2010 commencing about 2:06  
p.m., pursuant to the Federal Rules of Civil  
Procedure.

1 the latter part of May when you found out that your  
2 son was the subject of possible discipline?

3 A Yeah. I remember sending a couple of them, yes.

4 Q Did you ever keep copies of those e-mails?

5 A I hope so.

6 Q Now, the Complaint that was filed on behalf of you,  
7 Mrs. Dupree, and Michael, did you review it before  
8 it was filed?

9 A Yes.

10 Q And when you reviewed it -- and I appreciate the  
11 fact this is sometime ago -- do you recall it being  
12 accurate?

13 A Wait. Are you talking about the Complaint that  
14 we -- that was filed several months ago?

15 Q Correct. Back in May of this year.

16 A Yes.

17 Q And there's reference in the Complaint to an e-mail  
18 that was sent, apparently to either you or your son,  
19 it's a little unclear from the Complaint, from  
20 Arlyce Seibert dated June 16th of 2004. Do you know  
21 what I'm talking about?

22 A Vaguely.

23 Q Okay. You say vaguely. Do you have a copy of that  
24 e-mail?

25 A I think I do. I think I know which one you're

1 specific to its terms.

2 Q Do you have a RICO claim against Cranbrook and  
3 Mr. Winter, Mr. Shaw in this case?

4 A Yes.

5 Q Can you tell me what the facts are to support your  
6 RICO claim against my clients?

7 A Not at this time.

8 MR. SCIOTTI: I should note for the  
9 record that I prepared the Complaint. I signed the  
10 Complaint. He did not.

11 MR. LINDEN: Thank you. I appreciate  
12 that.

13 BY MR. LINDEN:

14 Q But you indicated earlier on in your deposition, you  
15 reviewed the Complaint at some point; correct?

16 A Yes.

17 Q Did you review it before it was filed?

18 A I looked at it -- did I review it -- yes. I  
19 reviewed a draft of it.

20 Q What, if anything, did you do to prepare for today's  
21 deposition?

22 A I -- last night for about an hour and a half I  
23 reviewed the files that you -- that Cranbrook  
24 provided, the documents that Cranbrook provided and  
25 I looked over the -- some of the Interrogatories. I

1 did not review the Complaint.

2 Q Now, in your Complaint, among other things, there's  
3 an allegation that your son was threatened with  
4 criminal prosecution?

5 A Yes.

6 Q Who made that threat?

7 A My wife would speak better to that than me. I do  
8 not have the facts.

9 Q All right. So let me ask you this, then,  
10 Mr. Dupree: Were you present when a threat of  
11 criminal prosecution was made to your son?

12 A No.

13 Q Do you know if Mrs. Dupree was present when a threat  
14 of criminal prosecution was made to your son?

15 A Not that I recall.

16 Q So what's the source of your understanding that a  
17 threat of criminal prosecution was made toward  
18 Michael?

19 A My son's discussion with my wife relating to it.

20 Q All right. So again, Michael would be the person  
21 best to answer any questions I have about this  
22 subject?

23 A Him and my wife, yes.

24 Q Okay. Thank you. Now, there's some allegations in  
25 the Complaint about Cranbrook supposedly trying to

1 A Yeah. And that may have -- I may have spoke  
2 incorrectly. He may have said on the school records  
3 will indicate. In fact, now that I think about it,  
4 it was the school records, not the transcript.

5 Q Are you aware that your Complaint that was filed on  
6 your behalf specifically indicates that Charles Shaw  
7 told you that the favor that they were going to do  
8 for you was put on Michael's transcript that he had  
9 withdrawn from school?

10 A Well, the transcript would be a part of school  
11 records.

12 Q Okay. Do you know if your son ever met alone with  
13 John Winter about the computer allegations?

14 A I think he did.

15 Q And obviously, you have no firsthand knowledge about  
16 that?

17 A No.

18 Q Now, your Complaint makes an allegation about there  
19 being some studies showing that career earnings of  
20 those with a high school diploma exceed those with a  
21 GED. Are you aware of that?

22 A Yes.

23 Q Are you knowledgeable about those studies?

24 A Anecdotally.

25 Q But separate and apart from anecdotally, have you

1 notes after your meeting with Arlyce Seibert and  
2 your meeting with Pickett, Shaw, and Winter?

3 A No. If I had any notes, they were in that e-mail  
4 that I sent to Siebert.

5 MS. DUPREE: Siebert?

6 BY MR. LINDEN:

7 Q The e-mail that I showed you before, which is  
8 Exhibit 4?

9 A Yeah.

10 Q Okay. So in your Complaint one of the allegations  
11 is that somebody at Cranbrook informed somebody at  
12 Purdue that Michael had withdrawn from Cranbrook;  
13 correct?

14 A Somebody from --

15 Q Cranbrook spoke to somebody at Purdue and let them  
16 know that Michael had withdrawn from Cranbrook?

17 A Where was that? You said it was --

18 Q In your Complaint. Are you aware of that?

19 A I don't recall it right now in the Complaint it said  
20 that.

21 Q Let's go at it this way, Mr. Dupree. We've talked a  
22 little bit today about the conversation you had with  
23 Charlene Rencher and she disclosed to you that she  
24 spoke to folks at Purdue.

25 Are you aware of anybody other than